1 2 3	SUZANNE A. LUBAN Attorney At Law State Bar No. 120629 3758 Grand Ave. #4 Oakland, California 94610 Telephone 510/832-3555
4	Attorney for Defendant
5	RUBEŇ CAMPOS
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7	UNITED STATES DISTRICT COURT
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA
9	UNITED STATES OF AMERICA, ) D.C. No. CR 05-00117-PHJ
10	Plaintiff, ) (San Francisco)
11	vs. STIPULATION TO MODIFY CONDITIONS
12	OF PRETRIAL RELEASE
13	DAVID DOMINGUEZ, et al.  Defendant.  AND [PROPOSED] ORDER
14	Judge: Hon. Joseph C. Spero
15	Defendant DAVID DOMINGUEZ, by and through his counsel Michael L.
16	·
17	Hinckley, defendant RUBEN CAMPOS, by and through his counsel Suzanne A. Luban,
18	and the United States of America, through Assistant United States Attorney C. David
19	Hall, hereby stipulate and agree to a modification of the aforementioned defendants'
20	pretrial release conditions such that they be permitted to travel to all districts in the
21	State of California without restriction. Pretrial Services Officer Tim Elder, has
22	advised counsel for Mr. Campos that he has no objection to the proposed
23	modification. Mr. Campos and Mr. Dominguez are both on pretrial release secured by
24	property bonds. Both defendants recently entered pleas pursuant to negotiated plea
25	agreements.
26	The Government and the defendant, by and through their attorneys, hereby agree
27	and stipulate that the Court shall enter an order modifying the pretrial release
28	conditions of Mr. Campos and Mr. Dominguez to allow the defendants to travel
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1	throughout the State of California without restriction. The defendants shall continue
2	to abide by all other conditions of their release.
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4	Respectfully submitted,
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6	DATED: January 6, 2006  /S/ C. David Hall C. DAVID HALL
7	Assistant U.S. Attorney
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9	DATED: January 6, 2006  /S/ Suzanne A. Luban SUZANNE A. LUBAN
10	Attorney for Defendant Campos
11	
12	DATED: January 6, 2006  /S/ Michael L. Hinckley MICHAEL L. HINCKLEY
13	Attorney for Defendant Dominguez
14	
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16	
17	ORDER
18	Pursuant to stipulation, the aforementioned defendants' pretrial release
19	conditions are modified such that they are permitted to travel throughout the State of
20	California without restriction during the pendency of this case. All other terms and
21	conditions are to remain the same.
22	IT IS SO ORDERED.
23	Dated: January 9, 2006
24	JOSEPH C. SPERO
25	U.S. MAGISTRATE JUDGE
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